

AO 91 (Rev. 11/11) Criminal Complaint

Officer:

AUSA: Susan Fairchild

Hector Rivera

Telephone: (313) 226-9577

Telephone: (313) 771-6645

## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Humberto SANCHEZ-GOMEZ

Case No. 2:25-mj-30233

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 14, 2025 in the county of Oakland in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section*

8 U.S.C. 1326(a)

*Offense Description*

Unlawful Re-Entry Following Removal from the United States

This criminal complaint is based on these facts:

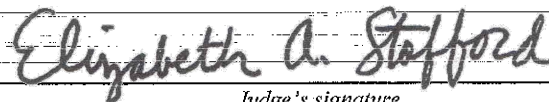
On or about april 14, 2025, in the Eastern District of Michigan, Southern Division, Humberto SANCHEZ-GOMEZ, an alien from Mexico, was found in the United States after having been denied admission, excluded, deported, and removed there from on or about October 18, 2019, and not having obtained the express consent of the Attorney General of the United States or the Secretary of the Department of Homeland Security to re-apply for admission thereto; in violation of Title 8, United States Code, Section 1326(a).

☐ Continued on the attached sheet.*Complainant's signature*

Hector Rivera, Deportation Officer

*Printed name and title*

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: April 15, 2025City and state: Detroit, MI*Judge's signature*

Elizabeth A. Stafford, U.S. Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT AND ARREST  
WARRANT**

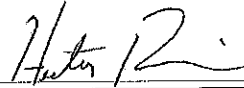
I, Hector Rivera, declare the following under penalty of perjury:

1. I am a Deportation Officer employed with Immigration and Customs Enforcement (ICE), Enforcement and Removal Operations (ERO) of the United States Department of Homeland Security (DHS) at the Detroit Field Office. I have been employed in this capacity since February 2007. I am currently assigned to the Detroit ICE-ERO Fugitive Operations team.
2. This affidavit is submitted for the limited purpose of establishing probable cause in support of a criminal complaint and an arrest warrant for Humberto SANCHEZ-GOMEZ, an alien who has previously been removed from the United States on or about October 18, 2019, at or near San Ysidro, California, and was thereafter found in the United States on or about April 14, 2025, without having obtained the express consent or permission of the Attorney General or the Secretary of the Department of Homeland Security to reapply for admission, all in violation of Title 8, United States Code, Section 1326(a).
3. The information contained in this affidavit is based upon my personal knowledge and observations, information provided by other law enforcement personnel to include ICE ERO Deportation Officers, and database record checks. I have also reviewed records from the official immigration file and system automated data relating to SANCHEZ-GOMEZ. I have not included every fact known to law enforcement related to this investigation.
4. ~~SANCHEZ-GOMEZ is a thirty-two-year-old citizen and native of Mexico~~ who last entered the United States on an unknown date, at an unknown place, without being inspected and admitted or paroled by an immigration officer.
5. On or about August 01, 2019, the United States Border Patrol (USBP) Agents near Paso Del Norte, Texas arrested SANCHEZ-GOMEZ after he illegally entered the United States. USBP served SANCHEZ-GOMEZ with an Expedited Removal, Form I-860.

6. On or about August 02, 2019, SANCHEZ-GOMEZ was convicted in the U.S. District Court, Western District of Texas, El Paso, for Illegal Entry, in violation of 8 U.S.C. §1325. He was sentenced to time served. On or about August 06, 2019, Immigration officials removed SANCHEZ-GOMEZ to Mexico through the Paso Del Norte, Texas port of entry.
7. On or about October 13, 2019, USBP Agents near Tecate, California arrested SANCHEZ-GOMEZ after he illegally entered the United States. USBP served SANCHEZ-GOMEZ with a Notice of Intent/Decision to Reinstate Prior Order, Form I-871. On or about October 13, 2019, Immigration officials removed SANCHEZ-GOMEZ to Mexico through the San Ysidro, California port of entry.
8. On or about October 17, 2019, USBP Agents near Tecate, California arrested SANCHEZ-GOMEZ after he illegally entered the United States. USBP served SANCHEZ-GOMEZ with an Expedited Removal, Form I-860. On or about October 18, 2019, Immigration officials removed SANCHEZ-GOMEZ to Mexico through the San Ysidro, California port of entry.
9. On April 14, 2025, the ICE/HSI Task Force Team traveled to the area of Brookwood Lane and Grantour Court in Pontiac, Michigan in search of Humberto SANCHEZ-GOMEZ, who is the target of an approved Field Operations Worksheet. At approximately 09:00 a.m., a male subject matching the physical description of SANCHEZ-GOMEZ and three other individuals departed the residence in a black-colored Audi. Officers initiated a vehicle stop at or near Walton and Updyke in Pontiac, Michigan to identify the Hispanic male based on the reasonable suspicion that this individual matched the description of SANCHEZ-GOMEZ seen exiting the residence. Officers identified themselves, contacted the driver and requested identification.
10. SANCHEZ-GOMEZ stated his name to be Humberto SANCHEZ-GOMEZ, and stated he is a citizen and national of Mexico. HSI TFOs' placed SANCHEZ-GOMEZ under arrest based on probable cause that he is an alien who had unlawfully reentered the United States after having been previously removed.

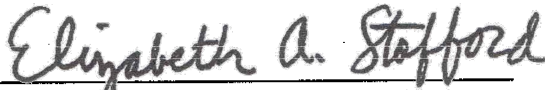
11. HSI TFOs' transported SANCHEZ-GOMEZ to the Detroit Field Office for processing. The arrest and subsequent detention of SANCHEZ-GOMEZ was an administrative, non-criminal action made pursuant to the authority found in sections 1357, 1225, 1226, and/or 1231 of Title 8, United States Code to arrest and detain any alien entering or attempting to enter the United States, or any alien present in the United States, who is reasonably believed to be in violation of any law or regulation regulating the admission, exclusion, expulsion, or removal of aliens.
12. SANCHEZ-GOMEZ's fingerprints and photograph were captured and searched in the ICE/FBI systems. The fingerprints returned with a positive match for Humberto SANCHEZ-GOMEZ, a native and citizen of Mexico who had previously been removed from the United States.
13. A review of SANCHEZ-GOMEZ's immigration file, record checks, and queries in the U.S. Department of Homeland Security databases confirmed that SANCHEZ-GOMEZ did not obtain the permission or express consent from the Attorney General or the Secretary of the Department of Homeland Security to reapply for admission to the United States following his removal on October 18, 2019.
14. On April 14, 2025, ICE-ERO served SANCHEZ-GOMEZ with Form I-871, Notice of Intent/Decision to Reinstate Prior Order.
15. Based on the above information, I believe there is probable cause to conclude that Humberto SANCHEZ-GOMEZ is an alien who has previously been removed from the United States on or about October 18, 2019, at or near San Ysidro, California and was thereafter found in the United States on or about April 14, 2025 in the Eastern District of Michigan, without first having

obtained the express consent or permission of the Attorney General or the Secretary of the Department of Homeland Security to reapply for admission to the United States, all in violation of Title 8, United States Code, Section 1326(a).



Hector Rivera, Deportation Officer  
Immigration and Customs Enforcement

Subscribed and sworn to before me and signed in my presence and/or by reliable electronic means.



Honorable Elizabeth A. Stafford  
United States Magistrate Judge